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February 15, 2008

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, D.C. 20554

Re: EB Docket No. 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith, on behalf of Texas RSA 8 South, LP d/b/a Westex Wireless, the carrier's 2007 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Should any questions arise regarding this submission, please contact the undersigned

Very truly yours,

Pamela L. Gist

Enclosures

cc: Enforcement Bureau, FCC (2)

Best Copy and Printing, Inc. (1)



P.O. Box 1329 Stanton, Texas 79782 432.756 3826

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, D.C. 20554

Re: Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007

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EB Docket No. 06-36

Form 499 Filer ID: 825692

Texas RSA 8 South, LP d/b/a Westex Wireless

## CERTIFICATION

I, <u>J. R. Wilson</u>, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 et seq. of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is incompliance with the requirements set forth in section 64.2001 et seq. of the rules.

Name: J. R. Wilson

Title: Executive Vice President

Date: February 15, 2008

Texas RSA 8 South, LP, d/b/a Westex Wireless ("Carrier"):

Address: PO Box 1329 Stanton, TX 79782

## **STATEMENT**

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI
  rules with respect to outbound marketing situations and maintains records of carrier
  compliance for a minimum period of one year. Specifically, Carrier's sales personnel
  obtain supervisory approval of any proposed outbound marketing request for customer
  approval regarding its CPNI, and a process ensures that opt-out elections are recorded
  and followed.
- Carrier took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: No know activity involving data brokers during 2007
- The following is information Carrier has with respect to the processes pretexters
  are using to attempt to access CPNI, and [if any] what steps carriers are taking to
  protect CPNI: There have been no known instances of pretexters seeking to access

CPNI. Carrier has invoked strict policy prohibiting the faxing or distribution of CPNI to any party including Carrier's own branch offices without a password; otherwise distribution is strictly limited to delivery to an existing customer in person with a valid ID or to customer's billing address of record.

- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: <u>-0-</u>
  - Category of complaint:
    - \_0\_ Number of instances of improper access by employees
    - <u>-0-</u> Number of instances of improper disclosure to individuals not authorized to receive the information
    - <u>-0-</u> Number of instances of improper access to online information by individuals not authorized to view the information
      - \_-0-\_ Number of other instances of improper access or disclosure
  - Description of instances of customer complaints, improper access or disclosure: N/A